



DIVISION OF  
ENFORCEMENT

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
100 PEARL STREET, SUITE 20-100  
NEW YORK, NY 10004-2616

February 16, 2023

**By ECF**

Hon. Kenneth M. Karas  
United States District Court  
United States Courthouse  
300 Quarropas Street, Chambers 533  
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*,  
12-CV-6421 (KMK)

Dear Judge Karas:

I write on behalf of the Securities and Exchange Commission ("SEC") to respectfully request that the Court set dates for the SEC's reply to the SEC's Order to Show Cause Why Edward and Dawn Bronson Should Not Be Held in Contempt and for any response or conference the Court may order in connection with the Bronsons' request for a settlement conference for after SEC counsel returns from travel outside the country.

As background, the Court held Mr. Bronson in contempt and ultimately incarcerated him for his violations of the Court's Orders to pay the SEC pursuant to the Final Judgment and a subsequently entered Payment Plan Order. DE 193, 223, 272 318, 326. When the SEC learned that Bronson had engaged in further violations of the Court's orders, the SEC sought and the Court held a hearing on December 12<sup>th</sup>.

On January 26, 2023, the Bronsons moved for a settlement conference or, alternatively, an emergency motion for release. DE 461. The SEC responded to the motion and an additional filing, DE 467, essentially stating that any such conference or motion is premature. DE 467, 484. Among the issues the SEC raised was a lack of documentation of what Bronson can pay. DE 484. The Court set a date of February 17, 2022 for the Bronsons' reply to the SEC's response. To date, the Bronsons have not produced any additional documents to address the deficiencies the SEC identified as necessary to a settlement.

On February 2, 2023 the SEC moved for an order to show cause why the Bronsons should not be held in contempt. DE 468-73. The Court ordered the Bronsons to respond by February 10th. DE 468. Dawn Bronson sought a one week extension for her response, which the Court granted. DE 481, 483. Bronson neither sought an extension nor responded. The SEC filed a letter stating that it did not object to the extension but

seeking a date to respond that would not conflict with dates that SEC counsel is not available. DE 482.

As SEC counsel will be out of the country from February 17<sup>th</sup> until February 26<sup>th</sup> and will need time to review and respond to any filings and/or prepare for any conference the Court may schedule, SEC counsel respectfully requests that the Court set any filing or conference dates for March 7<sup>th</sup> or after.

The SEC respectfully requests permission to serve this filing and any Order or pleading in this matter on Dawn and Edward Bronson by email to Dawn Bronson.

Respectfully submitted,  
*s/ Maureen Peyton King*